

### REMARKS

This amendment responds to the office action mailed February 18, 2005. In the office action the Examiner:

- rejected claims 1, 4-5, 7, 9, 12, 14-15, 17, 20 and 22-23 under 35 USC 103(a) as being unpatentable over Dobbs in view of Koppolu et al.; and
- rejected claims 6 and 21 under 35 USC 103(a) as being unpatentable over Dobbs in view of Koppolu as applied to claims 1-5, 7-20 and 22-24 and further in view of Weinberger et al.

After entry of this amendment, the pending claims are: claims 1-24.

### Phone Discussion with the Examiner on Apr. 21, 2005

The undersigned attorney and Yalei Sun held a telephone interview with Examiner Brinich on April 21, 2005. During the telephone call, the discussion focused on applicant's contention that the combined teachings of Dobbs and Koppolu do not teach the testing of a printer driver using a set or list of specific documents identified in a driver-test data structure. The Examiner indicated that he would reconsider the pending rejection under 35 USC 103(a) if the claims were amended to refer to a "list of specific documents."

### Claim Rejections - 35 U.S.C. 103(a)

#### Claims 1-5, 7-20, and 22-24

The pending claims, as amended, expressly recite that:

- the driver-test data structure associates **a list of specific documents** with a plurality of applications, as contrasted with Koppolu et al. that teaches associating documents types (e.g., a document type such as ".doc") with a particular application (col. 1, lines 59-66); and
- the testing of the printer driver includes **automatically** opening the plurality of applications and the associated specific documents identified in the driver-test

data structure and **automatically** printing the specific documents using the test driver.

The test pattern in the Dobbs reference is not equivalent to a driver-test data structure of the present invention. It is actually one predefined document. The document includes multiple images corresponding to different print modes. See, *e.g.*, col. 2, line 33-38. By printing the test pattern on different print media, a user is able to select the most appropriate print mode for each type of print medium. While this may incidentally involve some kind of “testing”, the testing by Dobbs does not involve automatically opening a list of specific documents using a plurality of applications, both of which are identified in a driver-test data structure. Nor does it involve automatically printing the list of specific document using a print driver.

The Windows registry feature in the Koppolu reference only associates document types with applications. For example, the registry on col. 2, lines 1-5 maps Word documents having the file name extension “.doc” to the application “winword.exe”. But the registry does not associate any specific document with the application, and does not include a list of specific documents. Similarly, the registry does not associate specific documents with a print driver for testing the print driver or for any other purpose. To print one Word document using one particular printer, a user has to **manually** drag and drop the document’s icon onto the printer’s icon.

By contrast, the present invention tests a print driver by using a driver-test data structure to identify a list of specific documents, and to open these specific documents, which are associated with different applications, and printing them using the print driver **automatically**. The distinction between document types and specific documents is relevant here because different documents of the same document type may be used to test different features of a print driver. Specific documents of the same type may contain different objects, features, options and so on. Furthermore, neither Dobbs nor Koppolu teach or suggest using a data structure having a list of specific documents to identify which documents to use to automatically test a print driver.

In summary, there are multiple aspects of the amended pending claims which patentably distinguish the pending claims over the combined teachings of Dobbs and Koppolu.

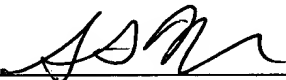
Claims 6 and 21

Weinberger teaches a method for incorporating additional indicia, e.g., "CONFIDENTIAL", into a document image generated by a print driver without modifying the source of the document image, e.g., a Word document, such that the indicia can appear on a printed copy of the document. Weinberger does not teach or suggest anything related to the testing of a print driver, and more specifically it does not teach the features of the presently claimed invention identified above as not being present in either Dobbs or Koppolu or any combination thereof. Therefore, claims 6 and 21 are patentable over Dobbs in view of Koppolu as applied to claims 1-5, 7-20 and 22-24 and further in view of Weinberger et al.

In light of the above amendments and remarks, the Applicants respectfully request that the Examiner reconsider this application with a view towards allowance. The Examiner is invited to call the undersigned attorney if a telephone call could help resolve any remaining items.

Respectfully submitted,

Date: April 25, 2005



Gary S. Williams

31,066

(Reg. No.)

**MORGAN, LEWIS & BOCKIUS LLP**

2 Palo Alto Square

3000 El Camino Real, Suite 700

Palo Alto, California 94306

(650) 843-4000